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10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 YASIEL PUIG VALDES,

18 Defendant.

No. CR 22-394-DMG

STIPULATION REGARDING REQUEST FOR
TRIAL DATE

PROPOSED TRIAL DATE: 01/10/2023

19
20 Plaintiff United States of America, by and through its counsel
21 of record, the United States Attorney for the Central District of
22 California and Assistant United States Attorneys Jeff Mitchell and
23 Daniel Boyle, and defendant YASIEL PUIG VALDES ("defendant"), both
24 individually and by and through his counsel of record, Keri Axel,
25 hereby stipulate as follows:

26 1. An Information and plea agreement in this case were filed
27 on August 29, 2022, and unsealed on November 14, 2022. Defendant
28 first appeared before a judicial officer of the court in which the

1 charges in this case were pending on November 15, 2022. The
2 Honorable Patricia Donahue, United States Magistrate Judge, did not
3 set a trial date because of the filed plea agreement and referred the
4 parties to this Court for a change of plea hearing.

5 2. Defendant appeared before this Court on November 23, 2022,
6 for a scheduled change of plea; however, defendant did not plead
7 guilty. At defendant's request, the Court continued the change of
8 plea hearing to November 29, 2022.

9 3. Defense counsel has advised the government that defendant
10 does not intend to plead guilty. The parties subsequently notified
11 the Court of defendant's intent, and the Court vacated the change of
12 plea hearing scheduled for November 29, 2022.

13 4. The Speedy Trial Act, 18 U.S.C. § 3161, requires that the
14 trial commence on or before January 24, 2023.

15 5. Defendant is released on his own recognizance pending
16 trial. The parties estimate that the trial in this matter will last
17 approximately five days.

18 6. By this stipulation, the parties request that the Court set
19 a trial date of January 10, 2023.

20 7. Nothing in this stipulation shall preclude a finding that
21 other provisions of the Speedy Trial Act dictate that additional time
22 periods be excluded from the period within which trial must commence.
23 Moreover, the same provisions and/or other provisions of the Speedy

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1 Trial Act may in the future authorize the exclusion of additional
2 time periods from the period within which trial must commence.

3 IT IS SO STIPULATED.

4 Dated: November 28, 2022

Respectfully submitted,

5 E. MARTIN ESTRADA
6 United States Attorney

7 SCOTT M. GARRINGER
8 Assistant United States Attorney
9 Chief, Criminal Division

10 /s/ Jeff Mitchell

JEFF MITCHELL

DANIEL BOYLE

Assistant United States Attorney

11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA

13
14
15 Dated: December 1, 2022

/s/ Per E-Mail Authorization

KERI CURTIS AXEL

Attorney for Defendant

Yasiel Puig Valdes